

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IAN RUPERT,

Plaintiff,

Civil Action No. 5:21-cv-00465-J

v.

CREDIT CONTROL, LLC et al.

Defendants.

**UNOPPOSED MOTION FOR LEAVE TO FILE ANSWER OR OTHERWISE PLEAD
OUT OF TIME**

Defendant Credit Control, LLC, (“Credit Control”), files its Unopposed Motion for Leave to File its Answer or otherwise plead out of time respectfully and requests this Court extend the time up to and including June 23, 2021.

1. Plaintiff filed her complaint on May 7, 2021. Doc. 1.
2. Credit Control was served on May 13, 2021.
3. As such, Credit Control’s answer was due on June 2, 2021.
4. Credit Control’s undersigned counsel received notice of service of the Complaint on June 9, 2021, past the deadline. Credit Control’s counsel conferred with Plaintiff’s counsel who consented to an extension to June 23, 2021 for Credit Control to Answer or otherwise plead.
5. Credit Control needs additional time to fully respond to the Complaint in order to properly research and investigate the Complaint.
6. This is Credit Control’s first request for an extension of time is not done so for delay but so that justice might be done.

Considering the above, Defendant Credit Control, LLC, respectfully requests that this Court grant this Motion for Leave to Answer or Otherwise Plead and set the new deadline at June 23, 2021.

Dated: June 9, 2021

Respectfully submitted,

MALONE FROST MARTIN PLLC

s/ Patrick A. Watts

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***COUNSEL FOR DEFENDANT
CREDIT CONTROL, LLC***

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via the Court's

ECF filing system on this 9th day of June, 2021, to:

Victor R Wandres
Paramount Law
1202 E 33rd St
Tulsa, OK 74105
Ph: 918-200-9272
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By: /s/ Patrick A. Watts